

## **Responses to Public Comments from the Public Notice**

Application for Renewal of Major Facility Review Permit  
**United Airlines, Inc. - San Francisco Maintenance Center**  
**Maintenance Base Bldg. 49-2 – SFOEN**  
**San Francisco International Airport**  
**San Francisco, CA 94128-3800**  
**Air District Facility No. A0051**

This document presents the responses of the Bay Area Air Quality Management District (“Air District” or “District”) to comments received from members of the public on the District’s proposed renewal of the Title V Major Facility Review Permit (“permit”) for United Airlines, Inc. - San Francisco Maintenance Center (United).

The Title V Major Facility Review Permit is required by Title V of the Clean Air Act. The Title V program requires large industrial facilities to apply for federal air quality operating permits. These permits list all of the federal, state, and local air quality requirements that apply to the facility. Applicable requirements include emission limits and standards, and compliance requirements (i.e., monitoring, recordkeeping, and reporting requirements). The Title V permit does not place new limits on the facility’s air pollution emissions. Following initial issuance, applications for renewals are required every 5 years. These renewals must go through public and EPA review. In a Title V permit renewal, the Air District performs the following tasks: 1) adds new, modified, and exempt equipment, 2) updates and reviews all federal, state, and local emission limits and standards applicable to the sources at the facility, 3) updates and reviews all monitoring, recordkeeping, and reporting requirements, and 4) reviews the compliance status for all applicable requirements. The existing Title V permit continues in force until the Air District takes final action on the renewal application.

The Air District published its proposal to renew the permit for United Airlines, Inc. - San Francisco Maintenance Center on February 01, 2018, and received written comments from the facility (United Airlines, Inc. - San Francisco Maintenance Center). No comments were received from EPA or individuals or other organizations. The Air District has reviewed and considered the comments it received during this process, and is providing responses as set forth herein. For each comment received, this document provides the Air District’s rationale for either agreeing with the comment and modifying its proposal, or disagreeing and continuing with the proposal as originally published.

These Responses to Comments are organized by each comment received:

## Green = Responses

**Comment 1: Withdrawal of EPA's Once-In-Always-In ("OIAI") Policy.** On January 25, 2018, EPA withdrew its OIAI policy. See Memo from W. Wehrum, EPA Assistant Administrator, to Regional Air Division Directors re Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act. The former OIAI policy provided that facilities that had not reduced their potential to emit hazardous air pollutants ("HAPs") below major source thresholds by a certain date would continue to be subject to applicable major source National Emissions Standards for Environmental Hazardous Air Pollutants ("NESHAPs"), including the requirement to obtain a Title V permit. As recognized by the District in the proposed Statement of Basis:

United Airlines continues to be subject to 40 CFR Part 63, Subpart GG, "National Emission Standards for Aerospace Manufacturing and Rework Facilities". At the time this NESHAP was adopted, the United facility was a major source of HAPs, although operations have been reduced so that the facility has emissions below major source HAP thresholds today. Despite this, the Aerospace NESHAP is still an applicable requirement because of EPA's "once in always in" policy regarding NESHAP applicability.

United emphasizes that it is not seeking to exit the Major Facility Review Permit program or to discontinue compliance with the Aerospace NESHAP, which applies to major sources of HAPs, at this time. But United reserves the right to initiate this process in the future, in light of the EPA policy change and anticipated future rule-making.

**District Response:** The Air District understands that the EPA withdrew its OIAI policy on January 25, 2018. The Air District also understands that United can in the future initiate the process of applying to withdraw from the requirements of a major source NESHAP based on their current potential emissions of Federal HAPs being below the major source thresholds.

**Comment 2: Streamlining recordkeeping requirements.** Standard Condition I.E.2 of the proposed Permit states that "all records for federally enforceable requirements shall be maintained for at least five years from the date of creation of the record." United recommends deleting the requirements identified elsewhere in the Permit that provide for shorter record retention periods. This change will provide clarity and reduce ambiguity in the proposed Permit. Examples include: Regulation 8-16-501.5 in Table IV-A and Table IV-C, which specifies a 24-month retention period for records. Eliminating inconsistent record-keeping requirements also aligns with the purpose of EPA's guidance on streamlining Title V permits. EPA, *White Paper Number 2 for Improved Implementation of Part 70 Operating Permits Program* (March 5, 1996). This type of streamlining should occur as a matter of course.

**District Response:** The Air District has changed Regulation 8-16-501.5 requirements in Table IV-A and Table IV-C of the Final Permit to specify a 60 month retention period for records since United is a Title V facility under the Clean Air Act Amendments.

**Comment 3:** Incorrect capacity for S-401 (Fuel Quantity Process Units Repair and Refurbishment Station) listed in Table II-A and Table IV-O (Pages 11 and 55 of Proposed Permit). The proposed Permit identifies “42 FQPU/year” as the capacity for S-401. In the Authority to Construct (“ATC”) application for S-401, United stated that it “anticipates that it would repair no more than 42 FQPUs per year.” This quantity was then identified as a “capacity” in the related ATC (Application No. 27643) and in the subsequent Permit to Operate (“PTO”) (Condition #26311). However, a permit limit is not necessarily the same as a physical capacity. Although United will not process more than 42 FQPU/year, consistent with its ATC application and PTO, United asks that the capacity for S-401 be eliminated in Table II-A (both the “Description” and the “Capacity” columns) and from Table IV-O to avoid potential confusion.

**District Response:** The Air District will continue to list the capacity of S-401 as 42 FQPU/year in the Final Permit since it was listed in United’s permit application, and all the materials usage limits listed in Permit Condition #26311 are based on a maximum of 42 FQPUs repaired per year.

**Comment 4:** Remove exhaust fan rates in Table II for S-61, S-126, S-146, S-155, S-156, and S-157 (Pages 8 to 9) of the Proposed Permit. The exhaust fan rates (CFM) do not correlate to material throughput or emissions from these sources. Accordingly, United requests that the “capacities” for these sources, which are not enforceable permit limits, be removed to avoid confusion.

**District Response:** The Air District has removed exhaust fan rates in Table II in the Final Permit for S-61, S-126, S-146, S-155, S-156, and S-157 since the exhaust fan rates (CFM) do not correlate to material throughput or emissions from these sources.

**Comment 5:** Generally Applicable Requirements in Table III (Pages 14 to 18 of Proposed Permit).

- The table includes references to BAAQMD and SIP versions of Regulation 2, Rule 1 and separate references to BAAQMD and SIP versions of Regulation 2-1-429. Because Regulation 2-1-429 is already identified as a generally applicable requirement via the references to Regulation 2, Rule 1, United recommends deleting these citations to Regulation 2-1-429 to minimize redundancy.

**District Response:** The Air District understands that Regulation 2-1-429 is part of Regulation 2, Rule 1 but will leave the references to Regulation 2-1-429 in the Final Permit since it provides more clarity.

- Similarly, United recommends deleting the references to 40 CFR Part 82, Subpart E and Subpart F, which are included already in the general reference to 40 CFR Part 82.

**District Response:** The Air District understands that 40 CFR Part 82, Subpart E and Subpart F are part of 40 CFR Part 82 but will leave the references to 40 CFR Part 82, Subpart E and Subpart F in the Final Permit since it provides more clarity.

- The reference to 40 CFR Part 60, Subpart GG (Standards of Performance for Stationary Gas Turbines) can be removed. United no longer operates a gas turbine, and the equipment has been permanently removed, as indicated in the

proposed Statement of Basis at Pages 22 and 66, in Application #27393, and in United's Major Facility Review permit renewal application submitted on January 19, 2015.

**District Response:** The Air District has removed the reference to 40 CFR Part 60, Subpart GG (Standards of Performance for Stationary Gas Turbines) in Table III of the Final Permit since the turbine has been permanently removed from United's facility.

**Comment 6: Requirements for Condition #23542 in Table IV-B federally enforceable (Page 24 of Proposed Permit).** United notes that the Chrome Plating ATCM, which provides the basis for several requirements in Condition #23542, is federally enforceable. However, the federally enforceable column seems to indicate that the requirements are not.

**District Response:** The Air District has indicated that the requirements of Permit Condition #23542 are federally enforceable in Table IV-B of the Final Permit since these requirements are based on the federally enforceable Chrome Plating ATCM.

**Comment 7:** Regulation 9-1-304 in Table IV-F and in Table VII-F inapplicable to S-95 and S-96 (Boilers) (Pages 30 and 93 of Proposed Permit). The boilers are not capable of firing on liquid or solid fuels. Consequently, Regulation 9-1-304 does not apply and should be removed from Table IV-F and Table VII-F. In addition, United recommends clarifying the first paragraph on Page 25 of the proposed Statement of Basis as follows: "Regulation 9-1-302 limits SO<sub>2</sub> emissions from sources to 300 ppm. However, it does not apply to sources fired on liquid fuels. Liquid fuel sources are subject to 9-1-304, which limits the fuel sulfur content to 0.5% by weight."

**District Response:** The Air District has removed the references to Regulation 9-1-304 in Table IV-F and in Table VII-F in the Final Permit since they are not applicable to S-95 and S-96 (Boilers) which are fired on natural gas only. In addition, the Air District has made the clarification in the first paragraph on Page 25 of the proposed Statement of Basis.

**Comment 8: BAAQMD Regulation 8-8 in Table IV-J not federally enforceable (Page 41 of Proposed Permit).** Table IV-J identifies the provisions of BAAQMD Regulation 8, Rule 8 as federally enforceable. Only the SIP version of the rule, approved on August 29, 1994, is federally enforceable. See 59 Fed. Reg. 44328 (Aug. 29, 1994).

**District Response:** Since only the provisions of BAAQMD Regulation 8-8-308 are federally enforceable, the Air District has changed the provisions of other parts of BAAQMD Regulation 8, Rule 8 in Table IV-J of the Final Permit to not federally enforceable.

**Comment 9:** Inapplicable PTO conditions relating to emergency standby engines near school grounds (Pages 48, 50-51, 53, 65-66, and 68-69 of Proposed Permit). Part 5 of Condition #s 22820, 22850, and 22851 in United's PTO contains requirements that limit the operation of "stationary emergency standby diesel-fueled engine for non-emergency use" for engines that are "on school grounds or within 500 feet of any school grounds." Since the Facility is not located within 500 feet of any school, these

requirements do not apply. Accordingly, United requests they be deleted from the Permit.

**District Response:** Since the references to the proximity to school grounds are part of the standard template language in Permit Condition #s 22820, 22850, and 22851 the Air District will leave the references to the proximity to school grounds in the Final Permit.